

REMARKS

In the Office Action dated February 27, 2006, claims 1-21 were presented for examination. Claims 1-21 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Jang et al.*, “An Effective Mechanism for Index Update in Structured Documents”, ACM 1999, pages 383-390, in view of *Shin et al.*, “Bus: An Effective Indexing and Retrieval Scheme in Structured Documents”, ACM 1998, pages 235-243, and *Parupudi et al.*, U.S. Patent Publication No. 2005/0080902.

On May 30, 2006, Applicant submitted an RCE together with a Preliminary Amendment to the claims. Following submission of the Preliminary Amendment and prior to examination of the amended claims, Applicant’s Attorney and Examiner Huynh had an Examiner’s Interview to discuss the art of record and a proposed amendment to the claims. During the interview, U.S. Patent Publication No. 2005/0080902 to *Parupudi et al.* was discussed along with the other art of record. More specifically, the Examiner noted how *Parupudi et al.* searches a secondary world with a node identifier to determine a location of the node within a structure of nodes. Applicant’s Attorney noted that the invention of Applicant is entering a search string in the form of a document or document fragment into a search query in a structured document. There is no prior knowledge of a node identifier, or a string value at a node in the structured document of Applicant, as is required by *Parupudi et al.* The Examiner indicated that these appear to be distinguishable elements, and requested Applicant to amend the claims in a Supplemental Amendment to document the differences.

The remarks pertaining to *Jang et al.*, *Shin et al.* and *Parupudi et al.* in the prior communications are hereby incorporated by reference.

In the Office Action dated February 27, 2006, the Example states “Parupudi discloses encoding said attribute in the node identifier as a URL, and inserting said URL in the HTML document ([0083], [0111]).” Office Action dated February 27, 2006, page 4. Applicant has reviewed the lengthy *Parupudi et al.* publication and cannot find any verbiage pertaining to

searching a structured document with a string in the form of a document or document fragment. *Parupudi et al.* requires the node identifier to query the data structure, see paragraph 111. However, Applicant's invention does not employ an identifier or another string value. Rather, Applicant's invention is based upon developing a link to a section of a structured document based upon a string value in the form of a document or document fragment, and not a pre-determined node identifier value.

Each of Applicant's independent claims include a limitation associated with searching a document to create an identifier and to encode the generated identifier into an HTML formatted document, which does not appear in *Parupudi et al.* as alleged by the Examiner. Accordingly, based upon the above, Applicant respectfully requests that the Examiner remove the rejection of claims 1-21 under 35 U.S.C. §103(a).

Applicant believes that the present application is in condition for allowance. Accordingly, Applicant requests that the Examiner indicate allowability of claims 1-21, and that the application pass to issue. If the Examiner believes, for any reason, that personal communication will expedite prosecution of the application, the Examiner is hereby invited to telephone the undersigned at the number provided.

For the reasons outlined above, withdrawal of the rejection of record and an allowance of this application are respectfully requested.

Respectfully submitted,

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